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8 *Nevada Property 1 LLC*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 DEON MERCED, an individual; SERTHA
12 EVANS, an individual; and each of them on
behalf of all others similarly situated,

13 Plaintiff,

14 vs.

15 NEVADA PROPERTY 1, LLC d/b/a THE
16 COSMOPOLITAN LAS VEGAS; DOES I
through V, inclusive; and ROE
17 CORPORATIONS I through V, inclusive,

18 Defendants.

Case No.: 2:20-cv-00920-RFB-VCF

**STIPULATION TO EXTEND TIME FOR
DEFENDANT NEVADA PROPERTY 1
LLC TO FILE A RESPONSE TO
PLAINTIFFS' COMPLAINT**

19 IT IS HEREBY STIPULATED by and between Plaintiffs DEON MERCED and
20 SERTHA EVANS (jointly "Plaintiffs"), through their counsel, MAIER GUTIERREZ &
21 ASSOCIATES, and Defendant, Nevada Property 1, LLC, doing business as The Cosmopolitan of
22 Las Vegas ("Defendant"), by and through its counsel, Jackson Lewis P.C., that Defendant shall
23 have an extension up to and including August 17, 2020, in which to file its response to Plaintiff's
24 Complaint. This Stipulation is submitted and based upon the following:

25 1. Plaintiffs filed their Complaint on May 21, 2020. ECF No. 1. Defendant was
26 served with the Summons and Complaint on June 11, 2020. ECF No. 8.

27 2. Defendant's response to the Complaint is currently due on July 2, 2020.

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1 3. Counsel for Defendant was recently retained in this matter. Due to the press of
2 other matters, including adjustments made necessary by the COVID-19 pandemic, and in order to
3 fully respond to the pleading, Defendant requires additional time to respond to the Complaint.
4 Defendant accordingly requests a 45-day extension, up to and including August 17, 2020, to file
5 its responsive pleading.

6 4. This is the first request for an extension of time for Defendant to file a response to
7 Plaintiffs' Complaint.

8 5. This request is made in good faith and not for the purpose of delay.

9 6. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
10 as waiving any claim and/or defense held by any party.

11 Dated this 1st day of July, 2020

12 MAIER GUTIERREZ & ASSOCIATES

JACKSON LEWIS P.C.

13 /s/ Joseph N. Mott

/s/ Lisa A. McClane

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Attorneys for Defendant

Attorneys for Plaintiffs

ORDER

IT IS SO ORDERED.



U.S. Magistrate Judge

Dated: 7-1-2020